

The Honorable Chief Judge David G. Estudillo

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

PAUL D. ETIENNE, et al.,

Plaintiffs,

v.

ROBERT W. FERGUSON, et al.,

Defendants.

Case No. 3:25-cv-05461-DGE

**SUPPLEMENTAL DECLARATION OF
MATTHEW T. MARTENS IN
SUPPORT OF PLAINTIFFS' REPLY IN
FURTHER SUPPORT OF MOTION
FOR PRELIMINARY INJUNCTION**

SUPPLEMENTAL DECLARATION OF
M. MARTENS IN SUPPORT OF REPLY
No. 3:25-cv-05461-DGE

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1 I, Matthew T. Martens, hereby declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP and counsel to
3 Plaintiffs in the above-captioned matter.

4 2. I am over the age of eighteen and competent to make this declaration. I make this
5 declaration based on personal knowledge about which I am competent to testify.

6 3. Attached as Exhibit 15 is a true and correct copy of a May 9, 2024 press release by
7 the Washington State Office of the Attorney General, *Attorney General Ferguson Announces*
8 *Investigation into Catholic Church's Handling of Child Sex Abuse Allegations*, available at
9 [https://www.atg.wa.gov/news/news-releases/attorney-general-ferguson-announces-investigation-](https://www.atg.wa.gov/news/news-releases/attorney-general-ferguson-announces-investigation-catholic-church-s-handling)
10 [catholic-church-s-handling](https://www.atg.wa.gov/news/news-releases/attorney-general-ferguson-announces-investigation-catholic-church-s-handling).

11 4. Attached as Exhibit 16 is a true and correct copy of the State of Washington's
12 Petition to Enforce Investigative Subpoena, signed by then-Attorney General Robert W. Ferguson
13 on May 9, 2024, and filed in King County Superior Court.

14 * * *

15 I declare under penalty of perjury that the foregoing is true and correct.

16 
17 _____

18 Matthew T. Martens

19 EXECUTED this 11th day of July, 2025, at Washington, D.C.